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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA)
Plaintiff,)
v.) No. 4:16 CR 83 HEA/NCC
MICHAEL BRUCE MCDONALD)
Defendant.)

JOINT REQUEST TO CONTINUE TRIAL TO AGREED DATE

COMES NOW the parties, defendant MICHAEL BRUCE MCDONALD, through his attorneys, Robert C. Wolfrum and Kevin Curran, Assistant Federal Public Defenders, and the United States through Assistant United States Attorney Robert Livergood, to move this Court to continue this case, previously designated a complex case, from its current trial setting to the mutually agreed upon date of April 8, 2019. The parties make this request due to the time necessary to prepare for a trial in this cause.

Respectfully submitted,

/s/Robert Livergood
Assistant United States Attorney

/s/Robert C. Wolfrum /s/Kevin Curran Assistant Federal Public Defender 1010 Market Street, Suite 200 St. Louis, Missouri 63101 Telephone: (314) 241-1255 Fax: (314) 421-3177

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ATTORNEY FOR DEFENDANT

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<u>CERTIFICATE OF SERVICE</u>

I hereby certify that on December 17, 2018, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Rob Livergood, Assistant United States Attorney.

> /s/Robert C. Wolfrum ROBERT C. WOLFRUM Assistant Federal Public Defender